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5 UNITED STATES DISTRICT COURT
 6 EASTERN DISTRICT OF WASHINGTON

7 UNITED STATES OF AMERICA,)

8 Plaintiff,)

9 v.)

NO: CR-11-6087-LRS-2

**MOTION FOR TEMPORARY
 DETENTION AND DETENTION
 HEARING**

10 YOLANDA CALVO-ROBLES,)
 11)
 12)

13 Defendant.)
 14 _____)

15 The United States moves for the detention of Yolanda Calvo-
 16 Robles, for a period of not more than ten days, excluding
 17 Saturdays, Sundays, and holidays, pursuant to 18 U.S.C. § 3142(d).

18 1. This case is eligible for such a detention order because
 19 the case involves (check all that apply):

20 _____ Defendant on release, pending trial, etc., (18 U.S.C.
 § 3142(d)(1)(A)).

21 X Defendant not a citizen or lawful permanent resident
 (18 U.S.C. § 3142(d)(1)(B)).

22 AND

23 X Defendant may flee.

24 _____ Defendant may pose a danger to any other person or the
 community.

25 The United States further moves for pretrial detention of
 26 defendant, pursuant to 18 U.S.C. § 3142(e) and (f) and moves for a
 27 detention hearing within the foregoing ten-day period.

1 1. Eligibility of Case. This case is eligible for a
2 detention order because case involves (check all that apply):

- 3 ☐ Crime of violence (18 U.S.C. § 3156)
4 ☐ Maximum sentence life imprisonment or death
5 ☐ 10+ year drug offense
6 ☐ Felony, with two prior convictions in above categories
7 ☒ Serious risk defendant will flee
8 ☐ Serious risk obstruction of justice
9

10 2. Reason for Detention. The court should detain defendant
11 because there are no conditions of release which will reasonably
12 assure (check one or both):

- 13 ☒ Defendant's appearance as required
14 ☐ Safety of any other person and the community
15

16 3. Rebuttable Presumption. The United States will not
17 invoke the rebuttable presumption against defendant under Section
18 3142(e). (If yes) The presumption applies because (check one or
19 both):

- 20 ☐ Probable cause to believe defendant committed 10+ year
21 drug offense or firearms offense, 18 U.S.C. § 924(c)
22 ☐ Previous conviction for "eligible" offense committed
23 while on pretrial bond
24

25 4. Time for Detention Hearing. The United States requests
26 the court conduct the detention hearing before the expiration of
27 defendant's detention pursuant to 18 U.S.C. § 3142(d).
28

5. Other Matters.

DATED this 22nd day of December, 2011

MICHAEL C. ORMSBY
United States Attorney

s/Alison L. Gregoire
ALISON L. GREGOIRE
Assistant United States Attorney